

1 SUZANNE M. HANKINS (State Bar No. 157837)
smh@severson.com
2 JARLATH M. CURRAN, II (State Bar No. 239352)
jmc@severson.com
3 JEREMY T. KATZ (State Bar No. 267361)
jtk@severson.com
4 SEVERSON & WERSON, A Professional Corporation
19100 Von Karman Avenue, Suite 700
5 Irvine, California 92612
Telephone: (949) 442-7110; Facsimile: (949) 442-7118
6
7 MARK D. LONERGAN (State Bar No. 143622)
mdl@severson.com
8 SEVERSON & WERSON, A Professional Corporation
One Embarcadero Center, Suite 2600
9 San Francisco, California 94111
Telephone: (415) 398-3344; Facsimile: (415) 956-0439
10 Attorneys for Respondent
WELLS FARGO BANK, N.A.
11 (erroneously sued as Wells Fargo Bank)

12 **UNITED STATES DISTRICT COURT**

13 **CENTRAL DISTRICT OF CALIFORNIA — WESTERN DIVISION**

14 RALPH A. RONDA & GLADYS M.
15 RONDA,

16 Petitioners,

17 v.

18 WELLS FARGO BANK,

19 Respondent.
20
21
22
23
24
25
26
27
28

Case No. 2:15-cv-00948 PSG (JEMx)
Hon. Philip S. Gutierrez
Ctrm. 880 – Roybal

**REQUEST FOR JUDICIAL
NOTICE IN SUPPORT OF
RESPONDENT WELLS FARGO
BANK, N.A.'S MOTION TO
DISMISS PETITIONERS'
VERIFIED PETITION FOR
TEMPORARY INJUNCTION AND
OPPOSITION TO PETITION FOR
TEMPORARY INJUNCTION**

*[Filed concurrently with Motion to Dismiss
Petition, Opposition to Petition, and
(Proposed) Order]*

Date: April 13, 2015
Time: 1:30 pm
Ctrm.: 880 - Roybal

Action Filed: February 10, 2015
Trial Date: None Set

1 Pursuant to Federal Rule of Evidence Rule 201(b)(2) and (d), Respondent
2 WELLS FARGO BANK, N.A. (erroneously sued as Wells Fargo Bank) respectfully
3 requests that the Court take judicial notice of the following documents in support
4 of its Motion to Dismiss Petitioners' Verified Petition for Temporary Injunction
5 pursuant to Federal Rule of Civil Procedure 12(b)(6), and in support of
6 Respondent's Opposition to Petitioners' Petition for Temporary Injunction.

7 1. Deed of Trust dated September 24, 2008, and recorded in the Official
8 Records of the Los Angeles County Recorder's Office on August 26, 2008, as
9 Instrument Number 20081733114. A true and correct copy of the Deed of Trust is
10 attached hereto as Exhibit 1.

11 2. Notice of Default and Election to Sell Under Deed of Trust dated
12 April 23, 2012, and recorded in the Official Records of the Los Angeles County
13 Recorder's Office on April 25, 2012, as Instrument Number 20120611269. A true
14 and correct copy of the Notice of Default and Election to Sell Under Deed of Trust
15 is attached hereto as Exhibit 2.

16 3. Bankruptcy Court Docket as of February 19, 2015, in the United States
17 Bankruptcy Court, Central District of California Case Number 2:12-bk-48681-RN,
18 entitled *In re: Gladys D. Ronda*. A true and correct copy of the Bankruptcy Court
19 Docket is attached hereto as Exhibit 3.

20 4. Voluntary Chapter 7 Petition and Schedules filed November 20, 2012,
21 in the United States Bankruptcy Court, Central District of California Case Number
22 2:12-bk-48681-RN, entitled *In re: Gladys D. Ronda*. A true and correct copy of the
23 Voluntary Chapter 7 Petition and Schedules is attached hereto as Exhibit 4.

24 ///

25 ///

26 ///

27 ///

28 ///

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is The Atrium, 19100 Von Karman Avenue, Suite 700, Irvine, CA 92612.

On March 4, 2015, I served true copies of the following document(s):

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF RESPONDENT
WELLS FARGO BANK, N.A.'S MOTION TO DISMISS PETITIONERS'
VERIFIED PETITION FOR TEMPORARY INJUNCTION AND
OPPOSITION TO PETITION FOR TEMPORARY INJUNCTION**

on the interested parties in this action as follows:

Ralph A. Ronda
Gladys M. Ronda
618 N. Glendora Ave., #3
Covina. CA 91724

Plaintiffs, In Pro Per
Telephone: (626) 859-3058
res212c1@msn.com

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Severson & Werson's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 4, 2015, at Irvine, California.



Sabrina Gridlev